

August 6, 2013

Ms. Marlene H. Dortch,  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Dear Ms. Dortch,

The organizations represented on this letter are members of the Media Action Grassroots Network (MAG-Net). Collectively, our 160 members are working together for media change to end poverty, eliminate racism, and ensure human rights

**As members of MAG-Net, we oppose efforts to allow greater media consolidation because of the harm to communities of color.** To that end, we write to express our concerns with a study conducted by the Minority Media and Telecommunications Council. The study sought to examine the impact of cross-ownership on broadcast stations owned by women and people of color. But due to deep flaws in its methodology, the study fails to provide useful information to help the Commission determine the impact of lifting the cross-ownership rules on ownership diversity.

Through the years, media consolidation has exacerbated our nation's media inequality and severely impacted the ability of communities of color to tell their own stories. Despite making up close to 40 percent of the U.S. population, people of color account for only 3 percent of all full-power TV station owners and 8 percent of all full-power radio owners.

This ownership disparity has greatly contributed to the lack of diversity in our nation's newsrooms. Journalists of color make up just 19 percent of the local TV newsroom workforce and just 10.9 percent of the radio workforce. In addition, as the Commission debates whether to lift the ban on the ownership of broadcast stations by daily newspapers in the same market, the number of journalists of color working at dailies has dropped to its lowest level since 1990.

**The state of ownership diversity and newsroom diversity is simply unacceptable. It is a primary reason why people of color are marginalized and**



**covered stereotypically in the media.**

Our groups have consequently been troubled by the FCC's apparent unwillingness to address this situation, even though the Commission has stated that ownership diversity is an agency priority.

We support comments filed by groups like the National Association of Black Owned Broadcasters, Free Press, the United Church of Christ, Prometheus Radio Project, National Organization of Women Foundation, the National Hispanic Media Coalition, the Institute for Public Representation and others that have called on the Commission to disregard MMTC's deeply flawed study.

Further, as Free Press noted in its filing: "The flaws in the study's methodology, analysis and logic render it incapable of serving as a foundation for any Commission decision whatsoever, let alone one that has the potential to affect communities already marginalized in America's media industry."

In closing, MAG-Net urges the Commission to conduct a proper study that not only determines the impact of any rule change on ownership diversity, but also provides the agency with clear guidance on adopting policies that finally take proactive steps to increase broadcast ownership by women and people of color.

Sincerely,

amalia deloney  
Policy Director, Media Action Grassroots Network

Endorsing organizations:

1. Center for Media Justice
2. CivicMedia/Minnesota
3. Generation Justice
4. Highlander Research and Education Center
5. AdvoCare, Inc.
6. Line Break Media
7. Saint Paul Neighborhood Network
8. Media Mobilizing Project
9. Global Action Project
10. Jay's House
11. The LAMP
12. The Praxis Project



13. Media Action Center
14. Quote...Unquote, Inc.
15. Prometheus Radio Project
16. Visceral Ventures LLC
17. Common Cause
18. Art is Change
19. Instituto de Educación Popular Del Sur de California
20. Youth Media Project
21. Latino Print Network
22. Media Literacy Project
23. Deep Dish TV
24. Center for Digital Democracy
25. Institute for Local Self Reliance
26. Southwest Workers Union
27. Common Frequency